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December 22, 2022

Via Electronic Court Filing and Email

The Honorable Andrew L. Carter, Jr.
United States District Court, Southern District of New York
40 Foley Square, Room 435
New York, NY 10007

Re: Teachers Insurance and Annuity Association of America v. Melanie Simons, Case No. 1:21-cv-03712-ALC

Dear Judge Carter:

Pursuant to the parties' Case Management Plan, by correspondence dated December 7, 2022 I wrote to advise the Court that all discovery, including expert discovery, is complete in the above matter and that Defendant will file a motion for summary judgment at the end of the month. Upon further review, Plaintiff also intends to file a motion for summary judgment.

Respectfully submitted,

/s/ Christopher C. Coss
Christopher C. Coss

cc: Counsel of Record (via ECF)